

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF NORTH CAROLINA
3 CHARLOTTE DIVISION 3:20-CV-00504-FDW-DSC
4

5 CPI SECURITY SYSTEMS, INC.,

6 Plaintiff and
7 Counterclaim Defendant,

8 vs.

9 VIVINT SMART HOME, INC.
10 f/k/a MOSAIC ACQUISITION
11 CORP.; LEGACY VIVINT SMART
12 HOME, INC. f/k/a VIVINT SMART
13 HOME, INC.,

14 Defendants and
15 Counterclaimants.

16 VIDEOTAPED VIRTUAL ZOOM 30(b)(6) DEPOSITION OF
17 CPI SECURITY SYSTEMS, INC. BY JOHN SHOCKNESSE

18 (Taken by Defendants/Counterclaimants)

19 Charlotte, North Carolina

20 Thursday, September 23, 2021

21 Reported by Andrea L. Kingsley, RPR

22 Job No. CS4810616
23
24
25

A P P E A R A N C E S
(All via Zoom)

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ALSO PRESENT: Paula Castro, Greenberg Traurig

VIDEOGRAPHER: DeAndrae Harris

VIDEOTAPED VIRTUAL ZOOM 30(b)(6)
DEPOSITION OF CPI SECURITY SYSTEMS, INC. BY
JOHN SHOCKNESSE, a witness called on behalf of
the Defendants/Counterclaimants pursuant to
the Federal Rules of Civil Procedure, before
Andrea L. Kingsley, Notary Public, in and for
the State of North Carolina, at Charlotte,
North Carolina, on Thursday, September 23,
2021, commencing at 9:06 a.m.

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1 Q. The answer to my question is yes, you
2 did testify earlier that customer statements are not
3 always reliable in part because, for example, the
4 customer may have an economic motivation to not give
5 a reliable statement; yes or no to that?

6 MR. HOBBS: Objection to the form.

7 A. Yes, you did ask me that and I gave that
8 answer.

9 Q. I think we are done. Let me ask you,
10 Mr. Shocknesse, now that it's been a long day and
11 we've covered a lot of topics, any testimony that
12 you have given today that you feel you need to
13 change or modify or amend in any way?

14 A. No. I think after lunch we clarified my
15 confusion. So.

16 Q. Okay. Other than that, nothing you need
17 to clarify or amend or change in your testimony?

18 A. Nothing that I can think of, sir.

19 Q. Okay. Then I am done with my initial
20 examination. I don't know if your counsel might
21 have questions for you. If they do, I might have
22 some follow up. But I will -- if not, I thank you
23 for your time.

24 MR. HOBBS: No questions from me.

25 I think this concludes Mr. Shocknesse's